

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

SUNCO TIMBER (KUNSHAN) CO., LTD.
Plaintiff,

v.

LINDA SUN, DAVID SUN, SHILLOCK
YUAN-SUN, and INFINITY WOOD
PRODUCTS, LLC,
Defendants,

SUNCO, INC., EASTMAN ST.
DISTRIBUTORS LLC, EASTMAN ST.
WOODWORKS, INC., INFINITY REALTY
COMPANY LLC, AND NEW SUN LIMITED
PARTNERSHIP,

Reach and Apply Defendants, and
Fraudulent Conveyance Defendants.

Civil Action No. 1:22-cv-10833 MJJ

LINDA SUN,
Counterclaimant,

v.

SUNCO TIMBER (KUNSHAN) CO., LTD.,
Counterclaim Defendant.

Affidavit of Connie Dai

I, Connie Dai, do swear and depose as follows:

1. I am counsel for Plaintiff Sunco Timber (Kunshan) Co., Ltd.
2. I have been engaged with counsel for Defendant L. Sun in connection with her request to supplement answers to certain interrogatories related to recognition of a Chinese judgment and preclusion of claims on counts against L. Sun.

3. I agreed to engage in these discussions, despite the fact of the pending stay in discovery. I did this both as a courtesy to L. Sun's counsel and to try to take issues off the table in the case.
4. I had to take two weeks off from work to visit my aging parents in Shanghai from June 25, 2024 to July 10, 2024.
5. On the morning of June 25, 2024, just a few hours before my departure to the airport, I notified counsel for L. Sun that I was leaving for China for personal reasons, and I could not attend to this matter during the trip. But I communicated that when I return, we would pick up our discussions.
6. I also stated that I didn't think it is appropriate to file a motion to compel because there was a discovery stay order from the court on June 7, 2024.

SIGNED UNDER THE PAINS AND PENALTIES OF PERJURY ON THIS 19th DAY OF JULY, 2024.

DocuSigned by:

CONNIE DAI

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Connie Dai